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DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 6/16/2021

GEORGIA M. PESTANA
Acting Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

JOSHUA KAUFMAN
Assistant Corporation Counsel
Phone: (212) 356-3521
Fax: (212) 356-3509
Email: jokaufma@law.nyc.gov

June 16, 2021

BY E.C.F.

Honorable Robert W. Lehrburger
United States Magistrate Judge
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Alonza I. Knowles v. St. Barnabas Hospital, et al., 21-CV-2569 (GHW)
(RWL)

Your Honor:

I am an Assistant Corporation Counsel in the Office of Georgia M. Pestana, Acting Corporation Counsel of the City of New York, and the attorney for defendant City of New York (“City”), in the above-referenced matter. In that capacity, the undersigned respectfully writes to request a fourteen-day (14) enlargement of time from June 24, 2021 to July 8, 2021 to file defendant’s motion to dismiss pursuant to the Federal Rules of Civil Procedure Rule 12(b)(6). *See* Docket Entry Number 33. The undersigned makes this request because of the City’s current technological limitations. This is defendant’s second request for an enlargement of time in this matter. *See* Docket Entry Number 32. Pursuant to your Honor’s Individual Rules, the undersigned attempted to contact plaintiff telephonically on June 16, 2021, to obtain plaintiff’s consent to the request herein, but plaintiff did not answer his phone on two occasions.

As Court is likely aware, the New York City Law Department identified unauthorized access within the NYC Law Department’s IT environment last week. *See* Benjamin Weiser and Ashley Southall, *New York City’s Law Dept. Is Struck by Cyberattack; Extent of Breach Is Unclear*, N.Y. Times, June 8, 2021, at A19. As a result, the Law Department’s computer systems were taken off-line and staff was unable to access systems, including not only email, but also electronic files and address books. Accordingly, and in light of the City’s current technological limitations, defendant respectfully request an enlargement of time from June 24, 2021 to July 8, 2021 to file defendant’s motion to dismiss plaintiff’s Complaint pursuant to FRCP Rule 12(b)(6).

Thank you for your consideration herein.

Respectfully submitted,

Joshua Kaufman

Joshua Kaufman
Assistant Corporation Counsel
Special Federal Litigation Division
(212) 356-3521

cc: **Via FIRST CLASS MAIL**

Alonza I. Knowles
Plaintiff *Pro Se*
2066 Morris Avenue Apt. 405
Bronx, NY 10453

Defendant's request is granted.
Motion to dismiss due by **July 8, 2021**. Plaintiff's opposition due by **August 7, 2021**. Plaintiff's reply, if any, due by **August 21, 2021**.

SO ORDERED:

6/16/2021


HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE

The Clerk's Office is respectfully directed to mail a copy of this Memo Endorsement to Plaintiff pro se and note service on the docket.